Mr. James Roark
Reiter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

Re: 089-15455
First Significant Permit Modification to:
Part 70 permit No.: T089-6629-00013

Dear Mr. Roark: July 30, 2002

Reiter Automotive North America, Inc. was issued a Part 70 operating permit on June 16, 1999 for an automotive parts manufacturing facility. A letter requesting changes to this permit was received on December 20, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of removal of the thermal oxidizers on Line 91 and 92.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/MP

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Air Compliance Section Inspector - Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 16, 1999

1st Administrative Amendment No: 089-11497-00013	Issued: November 24, 1999
2nd Administrative Amendment No: 089-12125-00013	Issued: April 20, 2000
1st Minor Permit Modification No: 089-12506-00013	Issued: September 26, 2000
3rd Administrative Amendment No: 089-12693-00013	Issued: October 17, 2000
4th Administrative Amendment No: 089-14776-00013	Issued: October 9, 2001
2nd Minor Permit Modification No: 089-14668-00013	Issued: October 10, 2001

1st Significant Permit Modification No: 089-15455-00013	Pages changed: 4, 8, 9, 10, 41, 42, 43, 44, 52
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch	Issuance Date: July 30, 2002

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stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:

(A) Two (2) bag dump stations:
(1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,

(2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,

(B) One (1) vacuum receiver, capacity 108 pounds per hour,

(C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,

(D) Two (2) reverse roll coaters, with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,

(E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

(A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,

(B) One (1) fiberglass opener,

(C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,

(D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,

(E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,

(F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,

(G) One (1) feed hopper,

(H) One (1) air lay,

(I) One (1) reclaim screen,

(J) One (1) classifier,

(K) One (1) picker,

(L) One (1) resin destributor,

(M) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and

(N) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:

(A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;

(B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;

(C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;

(D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;

(E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;

(F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;

(G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;

(H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;

(I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;

(J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;

(K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;

(L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;

(M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;

(N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;

(O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;

(P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;

(Q) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and

(R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.

(10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses as control,

exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:

(A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (FCU-2 (new)).

(B) Four (4) bale breakers;

(C) One (1) feed hopper.

(D) One (1) fiber opener,

(E) One (1) airlay,

(F) One (1) classifier,

(G) One (1) reclaim screen,

(H) One (1) picker,

(I) One (1) resin distributor, and

(J) Two (2) aspirator tables.

(11) One (1) fOAQ part cell, identified as FOAQ Cell Injection Molding, under construction 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:

(A) Two (2) chemical storage tanks, 8,000 gallon capacity each,

(B) One (1) metering system,

(C) One (1) robotic injector, and

(D) One (1) nitrogen blank system for chemical storage tanks.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5;

(2) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons.

(3) Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units,

(4) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids,

(5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings,

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
- (B) One (1) fiberglass opener,
- (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
- (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
- (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
- (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
- (G) One (1) feed hopper,
- (H) One (1) air lay,
- (I) One (1) reclaim screen,
- (J) One (1) classifier,
- (K) One (1) picker,
- (L) One (1) resin distributor
- (M) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
- (N) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (FCU-2(new)).
- (B) Four (4) bale breakers;
- (C) One (1) feed hopper.
- (D) One (1) fiber opener,
- (E) One (1) airlay,
- (F) One (1) classifier,
- (G) One (1) reclaim screen,
- (H) One (1) picker,
- (I) One (1) resin distributor, and
- (J) Two (2) aspirator tables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-7]

(a) VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production, and total production shall not exceed fifteen thousand five hundred (15,500) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 11.63 tons per 12 consecutive month period.

(b) VOC emissions from Line 91 shall not exceed 1.70 pounds per ton of production, and total production shall not exceed five thousand and twelve (5,012) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 4.26 tons per 12 consecutive month period.

D.5.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler is limited to 0.40 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$Pt = 1.09 / Q^{0.26}$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.5.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the Line 91, Line 92, fiber prep and resin recycle shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 91 / FCU-2	6,000	0.03	1.54
Line 92 / FCU-4	16,704	0.03	4.29

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

VOC testing was performed on Lines 91 and 92 in February 2001 and March 1999, respectively, which demonstrated compliance with Condition D.5.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to those requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.5.6 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each month based on the total production for the most recent 12 consecutive month period.

D.5.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.8 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.9 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall keep monthly records of production from the Line 92 NAVA oven and the Line 91 conventional oven.

(b) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.10 Reporting Requirements

(a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

(b) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Line 91 and Line 92
Parameter: VOC
Limit: 5,012 and 15,500 tons per 12-month consecutive period, respectively

YEAR: _____

Month		Column 1	Column 2	Column 1 & 2
		Production (tons)	Production - Previous 11 months (tons)	12 Month Total (tons)
Month 1	Line 91			
	Line 92			
Month 2	Line 91			
	Line 92			
Month 3	Line 91			
	Line 92			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

July 30, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Significant Permit Modification

Source Background and Description

Source Name:	Rieter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue, Lowell, Indiana 46356
County:	Lake
SIC Code:	3714
Operation Permit No.:	T 089-6629-00013
Operation Permit Issuance Date:	June 16, 1999
Minor Source Modification No.:	089-15315-00013
Significant Permit Modification No:	089-15455-00013
Permit Reviewer:	ERG/MP

The Office of Air Quality (OAQ) has reviewed a modification application from Rieter Automotive North America, Inc., relating to the removal of the thermal ozidizers on lines 91 and 92.

History

On December 20,2001, Rieter Automotive North America, Inc., submitted an application to the OAQ requesting to remove the thermal ozidizers on lines 91 and 92. Rieter Automotive North America, Inc., was issued a Part 70 permit on June 16, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 21, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1 thru 3).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	
PM-10	
SO_2	
VOC	20.7
CO	
NO_x	

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification and a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(10)(A), as the potential to emit of VOC is greater than Fifteen (15) pounds per day, and the permit modification is being performed pursuant to 326 IAC 2-7-12(d).

County Attainment Status

The source is located in Lake County.

Pollutant	Status*
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	severe
CO	maintenance
Lead	attainment

*Lowell Indiana, is located in the portion of the county which is attainment for SO2.

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) The part of Lake County where the source is located has been classified as attainment for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	36.8
PM-10	31.6
SO_2	1.96
VOC	109.6
CO	18.9
NOx	33.96

(a) This existing source is a major stationary source because VOC emitted at a rate of 25 tons per year or more, and it is located in a severe ozone nonattainment area.

(b) These emissions are based on the TSD Addendum for SSM 089-11823-00013.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Line 91				4.26			
Line 92				11.63			
Total				15.89			

This modification to an existing major stationary source is not major because the emissions increase of VOC during the five year contemporaneous period is less than the de minimis levels of twenty-five (25) tons. (See page 3 of Appendix A for a list of increases over the past five years.) Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Entire Source

326 IAC 8-7 (Specific Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7 (Specific Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), this source must implement one (1) of the following emissions reduction measures:

(a) An overall VOC reduction from baseline actual emissions of at least ninety-eight percent (98%) by the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of ninety-eight (98%).

(b) Where it can be demonstrated by the source that control technology does not exist that is reasonably available and both technologically and economically feasible to achieve a ninety-eight (98%) reduction in VOC emissions, a source shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emission with the documented reduction in use of VOC containing materials or install and add-on control system that achieves an overall control efficiency of eighty-one percent (81%).

(c) Achieve an alternate overall emission reduction with the application of a reasonably available control technology (RACT) that has been determined as reasonable available by the U.S. EPA and the department. A petition developed in accordance with the procedures in 326 IAC 8-1-5 shall accompany the request for an alternative overall emission reduction.

The TSD for the Title V permit established that an overall ninety-eight percent (98%) or eighty-one percent (81%) reduction in VOC emissions was not economically feasible for these sources. Pursuant to Exemption (CP 089-9217-00013), issued on May 22, 1998, it was determined that Line 91 would comply with this rule through the use of a one (1) 15 million British thermal units per hour (mmBtu/hr) thermal oxidizer with a low NOx burner. Compliance for Line 92 was determined to be achieved through the replacement of the existing Proctor and Schwartz oven with a NAVA curing oven (which was done in 1995), along with the use of the Line 92 thermal oxidizer, which was installed in 1985.

For Line 91, the 1993 baseline actual VOC emissions are 22.42 tons per year, for Line 92 the 1993 baseline actual VOC emissions are 71.9 tons per year. Year 1993 was chosen as the baseline year as it is the year closest to 1990 for which the most accurate and complete emissions data is available. The source has indicated they are now able to achieve an 81% reduction in baseline actual VOC emissions without the use of the control equipment, and have requested to remove the two thermal oxidizers.

Since issuance of the TV permit, the source has changed the type of resin used in Line 91, and a stack test performed last year (3/13/01) reflects a reduction of 85.47% in uncontrolled VOC emissions. As such, the source has requested that VOC emissions be limited to 1.70 pounds per ton of product, and that production be limited to 5,012 tons per year. These measures result in an allowable VOC emission rate of 4.26 tons per year, which reflects an 81% reduction in baseline VOC emissions.

The installation of the NAVA oven in Line 92 in 1995 reduced uncontrolled VOC emissions by 95.89 percent. The source has requested that VOC emissions be limited to 1.50 pounds per ton of product, and that production be limited to 15,500 tons per year. These measures result in an allowable VOC emission rate of 11.63 tons per year, which reflects an 84% reduction in baseline VOC emissions.

326 IAC 2-7-6(1),(6) and 326 IAC 2-1.1-11 (Compliance Requirements)

The VOC limit of 1.50 pounds of VOC per ton of product for Line 92 was obtained from a test performed in 1999.

The Title V permit required testing of Line 91, which was performed in March of 2001, and those test results form the basis of the emission factor limit of 1.70 pounds of VOC per ton of product. Therefore, there are no additional testing requirements in this source modification.

326 IAC 2-3 (Emission Offset)

The proposed modification is not subject to 326 IAC 2-3 (Emission Offset), because the net emissions increase of volatile organic compounds (VOC) from the proposed source modification project with other net emissions increases from the source over a five (5) consecutive calendar year in a severe ozone nonattainment does not exceed twenty-five (25) tons per year, see Appendix A.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Proposed Changes

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses ~~and one (1) thermal oxidizer~~ as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

~~(M) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,~~

(**M**~~N~~) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and

(**N**~~O~~) One (1) 0.5 million British thermal units per hour (MMBTU/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses ~~and one (1) thermal oxidizer as control,~~ exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:

(A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (MMBtu/hr) ~~connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (MMBtu/hr), using a low NOx burner as control~~, exhausting to one (1) stack (FCU-2 (new)).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses ~~and one (1) thermal oxidizer as control~~, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
- (B) One (1) fiberglass opener,
- (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
- (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
- (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
- (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
- (G) One (1) feed hopper,
- (H) One (1) air lay,
- (I) One (1) reclaim screen,
- (J) One (1) classifier,
- (K) One (1) picker,
- (L) One (1) resin distributor
- ~~(M) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,~~
- (**M**~~N~~) One (1) 11.20 million British thermal units per hour (MMBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
- (**N**~~O~~) One (1) 0.5 million British thermal units per hour (MMBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses ~~and one (1) thermal oxidizer as control~~, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:

- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (MMBtu/hr) ~~connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (MMBtu/hr), using a low NOx burner as control~~, exhausting to one (1) stack (FCU-2(new)).
- (B) Four (4) bale breakers;
- (C) One (1) feed hopper.
- (D) One (1) fiber opener,
- (E) One (1) airlay,
- (F) One (1) classifier,
- (G) One (1) reclaim screen,
- (H) One (1) picker,
- (I) One (1) resin distributor, and
- (J) Two (2) aspirator tables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-7]

(a) VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production, and total production shall not exceed fifteen thousand five hundred (15,500) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 11.63 tons per 12 consecutive month period.

(b) VOC emissions from Line 91 shall not exceed 1.70 pounds per ton of production, and total production shall not exceed five thousand and twelve (5,012) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 4.26 tons per 12 consecutive month period.

~~(a) The input of Volatile Organic Compound (VOC) to the Line 92 and the usage of cleanup solvent for the Line 92 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 92 and Line 92 NAVA Oven shall not exceed forty-three (43) tons per year when using the thermal oxidizer with 81% overall control efficiency or the overall control efficiency determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. This input VOC limitation is shall be based on the following equation:~~

~~$VOC_{input} = VOC_{limit} / [1 - (Capture\ Efficiency)(Destruction\ Efficiency)]$~~

~~(b) The input of Volatile Organic Compound (VOC) to the Line 91 and the usage of cleanup solvent for the Line 91 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 91 shall not exceed forty-three (43) tons per year when using the thermal oxidizer with an 81% overall control efficiency or overall control efficiency to be determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. The input VOC limit shall be based on the following equation:~~

~~$VOC_{input} = VOC_{limit} / [1 - (Capture\ Efficiency)(Destruction\ Efficiency)]$~~

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Within 60 days after achieving maximum production rate the Permittee shall perform VOC testing on the Line 91 thermal oxidizer and during the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the Line 92 thermal oxidizer utilizing Method 25A and/or Method 25 or other methods as approved by the Commissioner.~~ **VOC testing was performed on Lines 91 and 92 in February 2001 and March 1999, respectively, which demonstrated compliance with Condition D.5.1.** This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to those requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

~~D.5.6 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data~~

D.5.**6**~~7~~ VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each month based on the total **production** ~~volatile organic compound usage~~ for the most recent 12 consecutive month period.

D.5.**7**~~8~~ Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.5.9 Thermal Incinerator [326 IAC 8-7]~~

~~(a) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the Line 91 conventional oven shall be in operation at all times when the Line 91 conventional oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (b). The temperature of the thermal oxidizer~~

~~at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.~~

~~(b) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 17.85 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven shall be in operation at all times when NAVA oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (a). The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.~~

D.5.8 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.**9**~~10~~ Record Keeping Requirements

~~(a) To document compliance with Condition D.5.9, the Permittee shall keep records of thermal incinerator temperatures from the 15 million British thermal units per hour (mmBtu/hr) Line 91 natural gas fired incinerator and the 17.85 million British thermal units per hour natural gas fired Line 92 Incinerator.~~

(**a**~~b~~) To document compliance with Condition D.5.1, the Permittee shall keep monthly records of ~~input volatile organic compound (VOC) for~~ **production from** the Line 92 NAVA oven and the Line 91 conventional oven.

(**b**~~c~~) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(**c**~~d~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.**10**~~11~~ Reporting Requirements

(a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

(b) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this

permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Line 91 and Line 92
Parameter: ~~VOC~~**Production**
Limit: ~~43 tons VOC per year each line~~ **5,012 and 15,500 tons per 12-month consecutive period, respectively**

YEAR: _____

Month		Column 1	Column 2	~~Column 3~~	~~Column 4~~	**Column 1 + 2** ~~[Column 1 * (1 - Column 2)] + [Column 3 * (1 - Column 4)]~~
		Production (tons) ~~VOC Input This Month (tons)~~	**Production - Previous 11 months (tons)** ~~Overall Control Efficiency (%)~~	~~VOC Input Previous 11 Months (tons)~~	~~Overall Control Efficiency (%)~~	~~VOC Emissions~~ 12 Month Total (tons)
Month 1	Line 91					
	Line 92					
Month 2	Line 91					
	Line 92					
Month 3	Line 91					
	Line 92					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-15315-00013, and the operation of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Permit Modification No., 089-15455-00013.

Appendix A: Emissions Calculations
Paddling Lines 1 and 2

Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Ave. , Lowell, IN 46356
SPM 089-15455
Plt ID: 00013
Reviewer: ERG/MP
Date: 01/17/2002

Padding Line 91 - PTE

Uncontrolled VOC EF (lb/ton produced) =	1.7	(3/13/01 Stack Test)
Capacity (lb/hr) =	3823	
VOC PTE (uncontrolled) = Capacity x VOC EF x 8,760 hours/year		(tpy)
VOC PTE (uncontrolled) =	14.2	(tpy)
VOC PTE (controlled) = (reflects 83.46% control efficiency)	2.4	(tpy)
Change in PTE by removing controls =	11.9	(tpy)

Padding Line 92 - PTE

Uncontrolled VOC EF (lb/ton produced) =	1.5	
Capacity (lb/hr) =	3280	
VOC PTE (uncontrolled) = Capacity x VOC EF x 8,760 hours/year		(tpy)
VOC PTE (uncontrolled) =	10.8	(tpy)
VOC PTE (controlled) = (reflects 82.05% control efficiency)	1.9	(tpy)
Change in PTE by removing controls =	8.8	(tpy)
Total change in VOC PTE by removing controls =	20.7	(tpy)

Appendix A: Emissions Calculations
Paddling Lines 1 and 2

Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Ave. , Lowell, IN 46356
SPM 089-15455
Plt ID: 00013
Reviewer: ERG/MP
Date: 01/17/2002

Padding Line 91 - Limited PTE

Uncontrolled VOC EF (lb/ton produced) =	1.7	(3/13/01 Stack Test)
Production Limit (ton/yr) =	5012	
Limited VOC (tons/yr) = VOC EF x Production Limit		
Limited VOC (tons/yr) =	4.26	

Padding Line 92 - Limited PTE

Uncontrolled VOC EF (lb/ton produced) =	1.5
Production Limit (ton/yr) =	15500
Limited VOC (tons/yr) = VOC EF x Production Limit	
Limited VOC (tons/yr) =	11.63
Total Limited VOC PTE (tons/yr) =	15.89

Appendix A: Emission Calculations

Net Emissions Increases Over a Five Year Period

Company Name: Rieter Automotive North America, Inc.

Address City IN Zip: 101 West Oakley Ave., Lowell, IN 46356

CP: 089-15455-00013

Plt ID: 00013

Reviewer: ERG/MP

Date: 01/23/01

Permit #	Date of Issue	Status	Equipment Covered	PTE (TPY) VOC
089-8167-00013	05/05/97	Registration	New Equipment to Modify Line 6&7	0.420
089-8353-00013	09/08/97	Exemption	Foam Part Cell to produce molded polyurethane	0.330
089-9967-00013	11/28/98	Registration	HETT Presses # 1 & # 2*	5.343
089-4774-00013	11/06/99	Registration	Closed Foam Part Line Consisting of Electric Oven	0.000
089-12506-00013	09/26/00	Minor Source Mod to TV Permit	Addition of HETT Press #3	2.672
089-14668-00013	10/10/01	Minor Permit Mod	One 14.3 MMBTU/hr Natural Gas fired VAPOR Circulate Steam Generator	0.300
089-15315-00013	Current Application	Minor Source Mod to TV Permit	Removal of Line 91 and 92 Thermal Oxidizers	15.890
Total Contemporaneous Increases and Proposal Project				**24.96**